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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

WILLIS SANDS, an individual,)
)
Plaintiff,)
)
vs.)
)
WYNN LAS VEGAS, LLC,)
Defendants.)

CASE NO. 2:10-cv-00297-RLH-PAL

STIPULATION AND REQUEST FOR
STAY OF ACTION
(First Request)

COME NOW the parties, by and through their respective counsel of record, and stipulate and request that the Court stay this action, including all proceedings and any discovery obligations pending completion of certain conditions precedent to an agreement entered into by the parties. In support of this Stipulation and Request, the parties set forth the following:

1. The parties entered into a confidential agreement ("Agreement") on October 28, 2010 to resolve this action and a pending charge of discrimination ("the Charge") Plaintiff filed with the Equal Employment Opportunity Commission ("EEOC").

2. The parties' performance under the Agreement is expressly predicated upon the EEOC closing the Charge based on Plaintiff's Request for Withdrawal or the EEOC's issuance of an Acknowledgment of Settlement indicating that it will no longer process the Charge for any purpose. If the EEOC fails to take such action, the parties are released from all obligations under the Agreement.

3. If the EEOC closes the Charge in the manner set forth in Paragraph 2 above, the parties will submit a Stipulation to Dismiss this action *with prejudice* within seven (7) business days of receiving written notice of the same from the EEOC.

4. If the EEOC does not close the Charge in the manner set forth in Paragraph 2 above, and the parties do not otherwise amend their Agreement or seek alternative relief from the Court, the parties shall return to the *status quo ante* with the unexpired deadlines in the Scheduling Order (Docket #19, filed May 19, 2010) reinstated and extended by the same period of time they were stayed, measured from October 28, 2010.

5. The parties shall file a Status Report with the Court on or before January 3, 2011 in the event they have not already submitted a Stipulation to Dismiss.

6. This request for a stay is not sought for any improper purpose or other reason of delay. Rather, it is sought only to provide the parties sufficient time to secure the EEOC's closure of Plaintiff's Charge and to complete the remaining obligations under their Agreement.

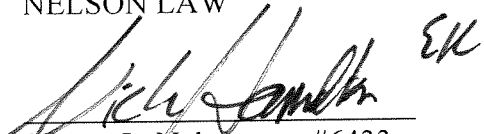
7. This is the first request for a stay of this action.

WHEREFORE, the parties respectfully request that the Court stay this action consistent with the terms set forth herein.

DATED this 1st day of November, 2010.

NELSON LAW


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ORDER

IT IS SO ORDERED.

DATED: November 2, 2010


UNITED STATES DISTRICT JUDGE